UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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SUBJECT: Borne Chemical: Analytic Results of Tank-Sampling Program

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TO: File

This is to review the results of a tank sampling program at the Borne Chemical sites initiated jointly by NJDEP Solid Waste Administration and Valley Forge Engineering, Borne's contractor. Originally, EPA had considered sampling the tanks using the FIT Team. However, sampling was repeatedly postponed at the request of the Hazardous Waste Strike Force. This was previously cause for concern, since data resulting from analyses performed several years ago on the material in a number of the tanks showed low flash point values. The data from the NJDEP/Borne sampling program was sent to us for review in March. The results of the split sampling program showed wide discrepancies in the reported concentrations of PCB's, with Borne's lab, Ecology & Environment (E&E), reporting values of less than 35 ppm while NJDEP's lab, Stablex-Reutter reporting concentrations well in excess of 500 ppm. NJDEP requested EPA assistance in the review of the data to resolve this problem. The data packages were sent to the Region II Research and Quality Assurance Branch and the National Enforcement Investigation Center (NEIC) in Denver for review. The results of this review are presented in correspondence from NEIC to myself and Ron Corcory at NJDEP. The review raised serious questions relating to the Stable-Reutter analysis while supporting the E&E analysis. In addition, I was informed by Dan Kraft and Barbara Greer that a similar problem with Stablex occurred at another site in New Jersey, with Stablex again reporting high levels of PCB's where the likelihood of PCB contamination was small. New Jersey has informed me of their intention to address PCB-analyses problems at the Stablex lab in the near future.

In summary, NJDEP will accept the E&E results showing no PCB's in excess of the 35 ppm detection limit and allow the material to be removed from the tanks.

One final point regarding the data is important; both NJDEP and Borne's data are in agreement on flash points for the tanks, reporting values greater than 180°F and greater than 200°F respectively. These values are for a number of the same tanks which showed low flash points in the past. Therefore, it is clear that the volatility of the material in the tanks is not as high as we thought.

In summary, the analyses of the tanks indicate that the material can be removed; Borne will therefore remove the material with NJDEP approval. Considering the on-going nature of NJDEP's involvement at Borne, the fact that the company appears to be cooperating with the state and the continuing effort to address all the material on the site, it appears that the FIT tank sampling program is unnecessary at this time.